

Case No: 16-01456-TOM  
UNITED STATES BANKRUPTCY COURT

Northern District of Alabama

In re: **Joseph Brooks, Jr.**  
**Mary W. Brooks**

Case no: **16-01456-TOM**  
Chapter: **13**

Property Address: **731 Pueblo Trail, Birmingham, AL 35214**  
Last four of any number you use to identify the debtor's account: **5010**  
Court Claim No. (if known). **25**

**RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

As contemplated by Fed. R. Bankr. Proc. 3002

**U.S. Bank Trust National Association, as Trustee of the FW Series I Trust**

("Creditor") hereby responds to that certain Notice of Final Cure Payment dated **02/10/2021** and filed as Docket No. **54**.

**Pre-Petition Default Payments**

X Agrees that Debtor(s) has paid in full the amount required to cure the default on the Creditor's claim

Total Amount Due: \$0.00

**Post-Petition Default Payments**

X Disagrees that Debtor(s) is current with respect to all payments consistent with 1322(b)(5) and states that the total amount due to cure Post-petition arrears is:

Total Amount Due: \$2,690.72

Attached as Schedule of Amounts Outstanding on Post-petition Claim is an itemized account of the post-petition amounts that remain unpaid as of the date of this cure notice. The amounts outstanding identified on Schedule 2 do not reflect amounts that became or may become due after the date of the Cure Notice, including any fees that may have been incurred in the preparation, filing, or prosecution of this Response to the Cure Notice.

The amounts due identified on this statement may not, due to timing, reflect all payments sent to Creditor as of the date of the Cure Notice. In addition, the amounts due may include payments reflected on the NDC but which have not yet been received and/or processed by Creditor.

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The person completing this Notice must sign it. Sign and print your name and your title (if any), and state your address and telephone number if different from the notice address listed on the proof of claim to which this supplement applies.

☐ I am the Creditor                      ☒ I am the Creditor's authorized agent/counsel (attach copy of power of attorney, if any).

I declare under penalty of perjury that the information provided in this Statement in Response to Notice of Final Cure Payment is true and correct to the best of my knowledge, information and reasonable belief.

/s/Amanda Beckett    2/23/21  
Signature                      Date

Amanda Beckett  
Title: Attorney for Creditor  
Rubin Lublin, LLC  
200 Clinton Avenue West, Suite 406  
Huntsville, AL 35801  
(877) 813-0992

**UNITED STATES BANKRUPTCY COURT**

**Schedule of Amounts Outstanding Post-Petition Claim**

Description	From	To	Date Incurred	Amount	Total
Missed Payment Group 1	01/01/2021	02/01/2021		\$1,166.86	\$2,333.72
Tax Advances			04/04/2018	\$357.00	\$357.00
Grand Total					\$2,690.72

CERTIFICATE OF SERVICE

I, Amanda Beckett of Rubin Lublin, LLC certify that I caused a copy of the Response to Notice of Final Cure Payment to be filed in this proceeding by electronic means and to be served by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to the said parties as follows:

Joseph Brooks, Jr.,  
731 Pueblo Trail  
Birmingham, AL 35214

Mary W. Brooks,  
731 Pueblo Trail  
Birmingham, AL 35214

William Gregory Biddle, Esq.  
The Biddle Law Firm, PC  
2100 First Avenue North Suite 340  
Birmingham, AL 35203

Bradford W. Caraway  
Chapter 13 Standing Trustee  
P O Box 10848  
Birmingham, AL 35202-0848

Executed on 2/23/21

By: /s/ Amanda Beckett  
Amanda Beckett  
AL State Bar No. ASB-1884-N75B  
Rubin Lublin, LLC  
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(877) 813-0992  
abeckett@rubinlublin.com  
Attorney for Creditor